

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

NORTHWELL HEALTH, INC.,	:	Civil Action No. 20 Civ. 06893 (LTS)
	:	
	:	
Plaintiff,	:	ORAL ARGUMENT REQUESTED
	:	
v.	:	
	:	
ILLINOIS UNION INSURANCE COMPANY,	:	
	:	
Defendant.	:	

**DECLARATION OF ROBIN L. COHEN, ESQ. IN SUPPORT OF
PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT**

Pursuant to 28 U.S.C. § 1746, I hereby declare as follows:

1. I am an attorney at the law firm McKool Smith, P.C., attorneys for the Plaintiff in the above-captioned matter. I submit this declaration in support of Plaintiff's motion for partial summary judgment.

2. Attached as Exhibit 1 is a true and correct copy of the Healthcare Premises Pollution Liability Policy No. HPI G27376939 002 issued by Illinois Union Insurance Company to Northwell Health, Inc. for the policy period April 25, 2017 to April 25, 2020.

3. Attached as Exhibit 2 is a true and correct copy of the letter from Yvette Nadgir to Maggie Emma, dated May 20, 2020.

4. Attached as Exhibit 3 is a true and correct copy of the letter from Robin Cohen to Yvette Nadgir, dated May 29, 2020.

5. Attached as Exhibit 4 is a true and correct copy of the letter from Robin Cohen to Yvette Nadgir, dated June 16, 2020.

6. Attached as Exhibit 5 is a true and correct copy of the letter from Kevin Haas to Robin Cohen, dated July 9, 2020.

7. Attached as Exhibit 6 are true and correct copies of excerpts from the World Health Organization's "Q&A on coronaviruses (COVID-19)," available at <https://www.who.int/emergencies/diseases/novel-coronavirus-2019/question-and-answers-hub/q-a-detail/q-a-how-is-covid-19-transmitted> and last accessed on September 18, 2020.

8. Attached as Exhibit 7 is a true and correct copy of the New York State Department of Health's "COVID-19 Frequently Asked Questions," available at https://coronavirus.health.ny.gov/system/files/documents/2020/04/doh_covid19_faqs_updated_041720_2.pdf and last accessed on September 18, 2020.

Executed on this 18th day of September 2020.

/s/ Robin L. Cohen
Robin L. Cohen